

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO**

In re POLYURETHANE FOAM ANTITRUST
LITIGATION

MDL Docket No. 2196
Index No. 10-MD-2196 (JZ)

This document relates to:

ALL CASES

NOTICE OF DEPOSITION

PLEASE TAKE NOTICE that pursuant to Fed. R. Civ. P. 30, the Direct Purchaser (Class) Plaintiffs, the Direct Action Plaintiffs, and the Indirect Purchaser (Class) Plaintiffs (“Plaintiffs”) will take a deposition of **David Flora** of Woodbridge at **Smith, Gambrell, & Russell, LLP, 1055 Thomas Jefferson Street, NW, Suite 400, Washington, D.C. 20007** on **August 23, 2013** at **9:00 a.m. E.S.T.** The testimony will be recorded by stenographic and videotaped means by a person authorized to administer oaths.

Pursuant to the Court's order at the October 24, 2012 hearing (ECF No. 436 at 77-78), Plaintiffs provide a brief description of the deponent, to extent allowed by the protective order in this matter, as follows: **sales representative**.

Dated: August 4, 2013

/s/ William A. Isaacson
William A. Isaacson
BOIES, SCHILLER & FLEXNER LLP
5301 Wisconsin Avenue, NW
Washington, DC 20015
Phone: 202-237-5607
Fax: 202-237-6131

/s/ Stephen R. Neuwirth
Stephen R. Neuwirth
QUINN EMANUEL URQUHART
& SULLIVAN, LLP
51 Madison Avenue, 22nd Floor
New York, NY 10010
Phone: 212-849-7165
Fax: 212-849-7100

Interim Co-Lead Counsel for Direct Purchaser (Class) Plaintiffs

/s/ Marvin A. Miller
Marvin A. Miller
MILLER LAW LLC
115 South LaSalle Street, Suite 2910
Chicago, IL 60603
Phone: 312-332-3400
Fax: 312-676-2676

Interim Lead Counsel for Indirect Purchaser Class Plaintiffs

/s/ William J. Blechman
William J. Blechman
KENNY NACHWALTER, P.A.
201 South Biscayne Blvd., Suite 1100
Miami, FL 33131
Phone: 305-373-1000
Fax: 305-372-1861

Liaison Counsel for Direct Action Plaintiffs